



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

October 31, 2003

Mr. Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 98504-3172

RECEIVED

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Dear Mr. Fiksdal:

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the BP Cherry Point Cogeneration Facility.

ENERGY FACILITY SITE
EVALUATION COUNCIL

Thank you for providing the Department of Ecology (Ecology) with the opportunity to comment on the DEIS for the BP Cherry Point Cogeneration Facility. We have reviewed the wetland portions of the DEIS and have the following comments:

- Section 1.6.8 of the DEIS states that many aspects of the Custer/Intalco Transmission Line No. 2 remain to be resolved such as the number, type and location of potentially new transmission towers, access roads, culverts and temporary laydown, staging and assembly areas. Any or all of these features could impact wetlands, and these potential impacts have not been identified. In addition, there is no mitigation proposed for these potential impacts. The Site Certification Agreement should be conditioned to require that, if new towers need to be built in the Line No. 2 easement, detailed wetland delineations will be completed, impacts assessed, and appropriate wetland mitigation designed and planned in conjunction with, but in addition to the current proposed plan. 1
- Using stormwater in the mitigation area has implications for water quality as well as water quantity. A condition should be included in the Site Certification Agreement or 401 Water Quality Certification that requires monitoring of stormwater before it enters the mitigation area. Stormwater should be monitored at regular intervals and during and immediately after larger storm events to ensure that stormwater is adequately treated. If state water quality standards are exceeded, contingency measures will need to be identified and implemented. 2
- Although well thought out, the wetland mitigation proposal is still in a conceptual phase. The plan briefly discusses certain elements such as excavating shallow swales and other topographic modifications, but the extent and locations of these swales and modifications is not shown. Ecology recommends that the Site Certification Agreement and subsequent 401 Water Quality Certification be conditioned to require a final wetland mitigation plan. Specifically, the following elements should be included: 3



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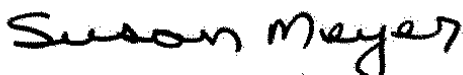
- A detailed grading plan. - This should include the exact location of the inlet channel and disperser outlets at the appropriate elevation to minimize the need for excavating shallow swales for conveying water across higher ground. Also, the mitigation plan refers to weirs in the inlet channel. Weirs should not be used in the mitigation area, since the idea behind the hydrologic restoration component of the plan was to eliminate engineered and artificial features such as ditches, to the extent possible. Although the inlet channel is necessary to convey the stormwater, it should be designed to function as simply as possible.
 - Specifics on the planting plan, such as which species will be planted in what locations in which year. - At this time there is discussion about phased planting, which seems appropriate, but more detail is needed in a final plan.
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- Figure 3.5-2 does not accurately reflect the wetland communities in the area. At least part of the "MF" forested area north of Brown Road in the location of the previously permitted transmission line is a forested wetland mosaic. The figure is deceiving in that it leads the reader to assume the area is mixed coniferous/deciduous forest, but not wetland. Most of the wetland areas depicted on this figure are shown as grasslands, when in fact, there are forested wetlands as well. This figure should be revised.

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cont.

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Once again, thank you for the opportunity to comment. If you have any questions, please phone me at 425-649-7168.

Sincerely,



Susan Meyer, Wetland Specialist
Shorelands and Environmental Assistance Program

cc: Jeannie Summerhays, Ecology